

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

ELIZABETH HORTON)	
)	
Plaintiff,)	
)	
v.)	
)	
DON WILLIAMS, individually and in his)	
capacity as the Manager of National)	
Seating and Mobility, Inc., NATIONAL)	
SEATING AND MOBILITY, INC.,)	
GERALD SHOCKLEY, individually,)	
)	
Defendants.)	
)	
)	
)	
)	
)	CIVIL ACTION NUMBER: 2:06-cv-526-MHT-TFM

**DEFENDANTS NATIONAL SEATING AND MOBILITY AND DON WILLIAMS'
NOTICE OF EVIDENTIARY SUBMISSION
IN SUPPORT OF THEIR JOINT MOTION FOR SUMMARY JUDGMENT**

Defendants National Seating and Mobility and Don Williams submit the following evidence in support of their motion for summary judgment:

A	Deposition of Elizabeth Horton, w/ exhibits: <ol style="list-style-type: none"> 1. 6/13/06 Adverse Action Notice from Baptist Health 2. Notice of Deposition Duces Tecum 3. 3/22/06 termination letter from Hyundai 4. NSM client database with notations by Horton 5. 1/24/05 Application to Hyundai 6. Horton resume 7. Plaintiff's Response to Defendant Don Williams' Interrogatories and Request for Production
B	Deposition of Felicia Barrow, w/ exhibits: <ol style="list-style-type: none"> 6. 2/16/05 Memorandum from Barrow to McIntyre 7. Medicaid Policy Section - Durable Medical Equipment 8. 8/2/04 Confidential Medicaid Complaint 9. 7/9/04 Memorandum from Barrow re: NSM 10. 5/9/05 transcript of interview with Don Williams 11. 6/23/05 transcript of interview with Felicia Barrow

C	Deposition of Cliff Johnson, w/ exhibit: 5. 6/14/05 and 7/12/04 Memoranda from Johnson re: NSM
D	Deposition of Anthony Green, w/ exhibits: 1. Confidential Medicaid Complaint 2. NSM client database with notations by Horton 3. 2/16/05 Memorandum from Barrow to McIntyre 4. 8/12/05 Summary Report of Investigation by Shockley
E	First affidavit of Gerald G. Shockley w/ attachments: 1. 7/9/04 referral memorandum 2. 6/1/05 transcript of interview with Michael Roeder 3. NSM client database with notations by Horton 4. Affidavit and Warrant
	Second affidavit of Gerald Shockley w/ attachment: A. 8/12/05 Summary Report of Investigation by Shockley
G	Affidavit of Michael Roeder
H	Affidavit of Don Williams
I	Declaration of Danielle Pirkle w/ exhibit: A. 6/28/05 transcript of interview with Danielle Pirkle
J	Docket sheet, <i>State of Alabama v. Elizabeth Walton Horton</i> , Crim. No. – DC-2005-2380 (Montgomery Co. District Court)

Respectfully submitted this 19th day of February, 2008.

s/Dorman Walker

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CERTIFICATE OF SERVICE

I hereby certify that on February 19, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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